

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

WILLIAM ANDERSON,
ANDREW LIN (a.k.a. TONY LIN),
ETIENNE UZAC,
LINGYI XIAO (a.k.a. JOHN XIAO),
CHRISTIAN MEDIA CORPORATION,
IBT MEDIA INC. (a.k.a. NEWSWEEK MEDIA
GROUP),
OIKOS NETWORKS, and
OLIVET UNIVERSITY

Defendants.



THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses William Anderson, Andrew Lin (a.k.a. Tony Lin), Etienne Uzac, Lingyi Xiao (a.k.a. John Xiao), Christian Media Corporation, IBT Media Inc. (a.k.a. Newsweek Media Group), Oikos Networks, and Olivet University of the crime of **SCHEME TO DEFRAUD IN THE FIRST DEGREE**, in violation of Penal Law §190.65(1)(b), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about July 18, 2013 to on or about October 31, 2018, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person and to obtain property from more than one person by false and fraudulent pretenses, representations and promises, and so obtained property with a value in excess of one thousand dollars from one and more such persons.

SECOND COUNT. / *12*

AND THE GRAND JURY AFORESAID, by this indictment, accuses William Anderson, Etienne Uzac, Christian Media Corporation, IBT Media Inc. (a.k.a. Newsweek Media Group) ("IBT Media"), and Oikos Networks of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about March 18, 2015 to on or about December 12, 2016, with intent that conduct constituting a class C felony, to wit, Money Laundering in the Second Degree, be performed, agreed with one and more persons to engage in and cause the performance of such conduct.

THE CONSPIRACY

During the period of this conspiracy, defendant William Anderson was the Chief Executive Officer of defendant Christian Media Corporation; defendant Etienne Uzac was the co-owner and Chairman of defendant IBT Media; and Unindicted Co-conspirator #1 was the General Manager of defendant Oikos Networks. The objects of the conspiracy were fraudulently to obtain financing from financial institutions, divert the proceeds of the financing and conceal its origins in order to fund day to day operations and meet other needs unrelated to the stated purpose of the financing, and maintain a credit profile sufficient to continue promoting the financing scheme. In order to achieve the objects of the conspiracy, Uzac and Anderson, on behalf of Newsweek, LLC and Christian Media Corporation, applied for financing from equipment lenders to purchase high-capacity computer servers. Although they obtained the requested financing, Newsweek, LLC and Christian Media Corporation did not obtain the quantity of servers for which the equipment lenders provided funds, and any servers they did

obtain were of inferior quality to the high-capacity servers called for in the financing agreements.

It was part of the conspiracy for Uzac and Anderson to overstate the respective financial health of Newsweek, LLC and Christian Media Corporation, in order to induce the equipment lenders to extend financing they would otherwise not extend. Uzac and Anderson caused the submission of false financial statements for both companies. The financial statements for Newsweek, LLC and Christian Media Corporation purported to be audited by Karen Smith of the accounting firm Karen Smith, LLP. Uzac and Anderson maintained a website, phone number, and email address for Karen Smith, LLP, when they knew that there was no such accounting business. Not only was the financial information provided in the financial statements overstated, but Karen Smith was a fictitious auditor created by Uzac and Anderson for the purpose of submitting false financial information to equipment lenders in order to obtain financing.

It was a further part of the conspiracy for Oikos Networks to hold itself out as an independent equipment vendor, and to provide equipment lists showing high-capacity Dell servers valued between approximately \$130,000.00 and \$180,000.00 each. Unindicted Co-conspirator #1, Uzac, and Anderson falsely told the equipment lenders that those lists represented the actual servers that Oikos Networks would provide to Newsweek, LLC and Christian Media Corporation with funds from the equipment lenders. Unbeknownst to the equipment lenders, personnel at Oikos Networks conspired with the other defendants to provide Dell servers that were fewer in number and inferior in quality as compared to the Dell servers shown on the equipment lists and incorporated into the lending agreements.

- 3) On November 2, 2015, Etienne Uzac, on behalf of Newsweek, LLC, signed an agreement with Lender #1 for approximately \$770,000 of financing for high-capacity computer servers to be installed at the offices of Newsweek, LLC, at 7 Hanover Square, New York, New York.
- 4) On November 9, 2015, pursuant to the November 2, 2015 agreement signed by Uzac and Lender #1, Oikos Networks accepted \$541,563.10 into an Oikos Networks account ending in *8551.
- 5) On November 10, 2015, personnel at Oikos Networks transferred approximately \$400,000 from the Oikos Networks account ending in *8551 to an account in the name of IBT Media ending in *4437.
- 6) On November 24, 2015, pursuant to the November 2, 2015 agreement signed by Uzac and Lender #1, Oikos Networks accepted \$232,098.60 into the Oikos Networks account ending in *8551.
- 7) On November 25, 2015, personnel at Oikos Networks transferred approximately \$200,000 from the Oikos Networks account ending in *8551 to an account in the name of IBT Media ending in *4437.
- 8) On February 13, 2016, Etienne Uzac told representatives of Lender #2 that he had arranged for Karen Smith of Karen Smith LLP, Newsweek's purported auditor, to contact Lender #2.
- 9) On February 25, 2016, Etienne Uzac, on behalf of Newsweek, LLC, signed an agreement with Lender #2 for approximately \$2,000,000.00 of financing for high-capacity computer servers to be installed at the offices of Newsweek, LLC, at 7 Hanover Square, New York, New York.

It was a further part of the conspiracy that Oikos Networks did not use the funds from the equipment lenders to purchase the Dell servers promised in the lending agreements. Instead, Oikos Networks, through Unindicted Co-conspirator #1 and others, transferred nearly all of the funds to accounts controlled by Uzac, Anderson, IBT Media, Christian Media Corporation, and unindicted co-conspirators known to the Grand Jury. It was a further part of the conspiracy that Oikos personnel, Uzac, and Anderson transferred the funds received from the equipment lenders through accounts in the names of Oikos, IBT Media, Christian Media Corporation, and unindicted co-conspirators known to the Grand Jury, in order to disguise the source of the funds and the circumstances under which they were obtained. In order to ensure a satisfactory credit profile for Newsweek, LLC and Christian Media Corporation, and to induce the equipment lenders to extend the equipment financing, Uzac and Anderson used portions of funds received from equipment lenders to make payments on previously-received financing. In some cases, Uzac and Anderson paid equipment lenders using funds received from new loans with the very same equipment lenders that they were paying back.

OVERT ACTS

In the course of and in furtherance of the conspiracy, the conspirators committed and caused to be committed the following overt acts:

- 1) On or about March 18, 2015, William Anderson purchased server space to host the website karensmithllp.com, which listed a phone number of (347) ***-1830 and a business address in Staten Island, New York.
- 2) On March 18, 2015, William Anderson registered the phone number (347) ***-1830, listing the username “karensmithllp” and the address of 22 Cortlandt Street, New York, New York.

- 10) On February 26, 2016, pursuant to the February 25, 2016 agreement signed by Uzac and Lender #2, Oikos Networks accepted approximately \$2,000,000.00 into the Oikos Networks account ending in *8551.
- 11) On February 26, 2016, personnel at Oikos Networks transferred approximately \$2,000,000.00 from the Oikos Networks account ending in *8551 to an Oikos Networks account ending in *8137.
- 12) On February 29, 2016, personnel at Oikos Networks transferred approximately \$1,000,000.00 from the Oikos Networks account ending in *8137 to an IBT Media account ending in *8945.
- 13) On February 29, 2016, personnel at Oikos Networks transferred approximately \$1,000,000.00 from the Oikos Networks account ending in *8137 to the IBT Media account ending in *4437.
- 14) On February 29, 2016, IBT Media and Etienne Uzac transferred approximately \$380,000.00 from the IBT Media account ending in *4437 to an account in the name of Newsweek, LLC ending in *4320.
- 15) On February 29, 2016, Etienne Uzac transferred \$40,000.00 from the Newsweek, LLC account ending in *4320 to Lender #1.
- 16) On March 22, 2016, Etienne Uzac transferred the subscriber and billing responsibility for the phone number (347) ***-1830 to his own name, listing the username as "karensmithllp", a last name "Uzae", first name "Etienne", and the address "7 Hanover Sq Fl 5, New York."
- 17) On April 27, 2016, Etienne Uzac, on behalf of Newsweek, LLC, signed an agreement with Lender #2 for approximately \$1,600,000.00 of financing for high-capacity computer servers to be installed at the offices of Newsweek, LLC, at 7 Hanover Square, New York, New York.

- 18) On May 4, 2016, pursuant to the April 27, 2016 agreement signed by Uzac and Lender #2, Oikos Networks accepted approximately \$1,500,000.00 into an Oikos Networks account ending in *5568.
- 19) On May 4, 2016, Oikos Networks transferred approximately \$700,000.00 from the Oikos Networks account ending in *5568 to the IBT Media account ending in *4437.
- 20) On May 4, 2016, IBT Media and Etienne Uzac transferred approximately \$385,000.00 from the IBT Media account ending in *4437 to the Newsweek, LLC account ending in *4320.
- 21) On May 4, 2016, Etienne Uzac transferred \$148,861.14 from the Newsweek, LLC account ending in *4320 to Lender #2.
- 22) On December 2, 2016, William Anderson, on behalf of Christian Media Corporation, signed an agreement with Lender #4 for approximately \$1,499,620.56 of financing for high-capacity computer servers to be installed at the offices of Christian Media Corporation at 22 Cortlandt Street, 21st Floor, New York, New York.
- 23) On December 2, 2016, pursuant to the December 2, 2016 agreement between Christian Media Corporation and Lender #4, Oikos Networks accepted \$1,499,620.56 into an Oikos Networks account ending in *9071.
- 24) On December 7, 2016, personnel at Oikos Networks transferred \$1,672,161.88 from the account ending in *9071 to an account in the name of Unindicted Co-conspirator #2 ending in *7936.
- 25) On December 7, 2016, Unindicted Co-conspirator #2 transferred \$1,672,161.88 from its account ending in *7936 to an account in the name of Unindicted Co-conspirator #3 controlled by William Anderson and ending in *8036.
- 26) On December 8, 2016, William Anderson transferred \$1,283,403.75 from the account ending in *8036 to a title and settlement company.

27) On December 12, 2016, William Anderson transferred \$49,148.57 from the account ending in *8036 to Lender #4.

THIRD COUNT 

AND THE GRAND JURY AFORESAID, by this indictment, accuses William Anderson, Lingyi Xiao (a.k.a John Xiao), Oikos Networks, and Olivet University of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about July 31, 2015 to on or about October 31, 2018, with intent that conduct constituting a class C felony, to wit, Money Laundering in the Second Degree, be performed, agreed with one and more persons to engage in and cause the performance of such conduct.

THE CONSPIRACY

During the period of this conspiracy, defendant William Anderson was a Trustee of defendant Olivet University and the Chief Executive Officer of Christian Media Corporation; defendant Lingyi Xiao (a.k.a John Xiao) was the Finance Director and a Dean at defendant Olivet University; Andrew Lin (a.k.a. Tony Lin) was the Chairman of the Board of Trustees of defendant Olivet University; Etienne Uzac was the co-owner and Chairman of IBT Media; and Unindicted Co-conspirator #1 was the General Manager of defendant Oikos Networks. The objects of the conspiracy were fraudulently to obtain financing from financial institutions, divert the proceeds of the financing and conceal its origins in order to fund defendant Olivet University's day to day operations and meet other needs unrelated to the stated purpose of the financing, and maintain a credit profile sufficient to continue promoting the financing scheme. In order to achieve the objects of the conspiracy, Anderson, Xiao, and others, on behalf of

Olivet University, applied for financing from equipment lenders for computer servers, including high-capacity servers, and other equipment.

It was part of the conspiracy for Anderson, Xiao, and others to overstate the financial health of Olivet University, in order to induce the equipment lenders to extend financing they would otherwise not extend. Anderson, Xiao, and Olivet University submitted and caused the submission of false audited financial statements and false company-prepared interim financial statements purportedly prepared on behalf of Olivet University. The false audited financial statements for Olivet University purported to be audited by Lynn Chen of the accounting firm Lynn Chen CPA. Unindicted Co-conspirators maintained a phone number and email address to list on the fake Lynn Chen letterhead, when they knew that there was no such accountant engaged by Olivet University. In fact, not only was the financial information provided in the financial statements overstated, but no such auditor existed: Lynn Chen was a fictitious auditor created for the purpose of making the false financial information submitted to equipment lenders appear to be legitimate.

It was a further part of the conspiracy for Oikos Networks to hold itself out as an independent equipment vendor, and to provide equipment lists reflecting high-capacity Dell servers valued between approximately \$130,000.00 and \$180,000.00 each, as well as other computer equipment. Unindicted Co-conspirator #1 and Anderson falsely told the equipment lenders that those lists represented the actual servers that Oikos Networks would provide to Olivet University with funds from the equipment lenders. Unbeknownst to the equipment lenders, personnel at Oikos Networks conspired with William Anderson, Xiao, Olivet University and others to engage in sham equipment financing transactions designed to funnel the proceeds to Olivet University and its affiliates.

It was a further part of the conspiracy that Oikos Networks did not use the funds from the equipment lenders to purchase the Dell servers promised in the lending agreements. Instead,

Oikos Networks, through Unindicted Co-conspirator #1 and others, transferred nearly all of the funds received from equipment lenders to accounts controlled by Anderson, Xiao, Olivet University, and Unindicted Co-conspirators known to the Grand Jury. It was a further part of the conspiracy that Oikos personnel, Anderson, Xiao, and others transferred the funds received from the equipment lenders through accounts in the names of Oikos, Olivet University, and Unindicted Co-conspirators known to the Grand Jury, in order to disguise the source of the funds, the circumstances under which they were obtained, and the fact that the funds constituted proceeds of specified criminal conduct. In order to ensure a satisfactory credit profile for Olivet University, and to induce the equipment lenders to extend the equipment financing, Anderson, Xiao, and others used portions of funds received from equipment lenders to make payments on previously-received financing.

It was a further part of the conspiracy that, Oikos personnel, Anderson, Xiao, and others created the false appearance of legitimate income to Olivet University by transferring funds received from the equipment lenders through accounts in the names of Unindicted Co-conspirators #3 – 12 to accounts in the name of Olivet University controlled by Xiao and others. For example, between September 10, 2015 and September 11, 2015, Oikos Networks transferred amounts ranging between \$200,000 and \$990,000 from its account ending in *8551 into the accounts of Unindicted Co-conspirators #3 – 12. Between September 10, 2015, and September 14, 2015, each of Unindicted Co-conspirators #3 – 12 transferred to Olivet University the same amount of money that it had received from Oikos Networks.

OVERT ACTS

In the course of and in furtherance of the conspiracy, the conspirators committed and caused to be committed the following overt acts:

- 1) On July 31, 2015, John Xiao, on behalf of Olivet University, emailed Olivet University's purported company-prepared interim financial statements to Lender #1.

- 2) On July 31, 2015, William Anderson, on behalf of Olivet University, emailed information concerning Olivet University's purported company-prepared interim financial statements to John Xiao, for forwarding to Lender #1.
- 3) On August 13, 2015, William Anderson, on behalf of Olivet University, signed a financing agreement with Lender #1 for, among other things, high-capacity computer servers to be installed at Olivet University's campus in Anza, California.
- 4) On June 17, 2016, William Anderson, on behalf of Olivet University, signed a financing agreement with Lender #7 for high-capacity computer servers to be installed at Olivet University's campus in Wingdale, NY.
- 5) On July 1, 2016, pursuant to the June 17, 2016 agreement between Olivet University and Lender #7, Oikos Networks accepted \$3,005,000 into an Oikos Networks account ending in *5568.
- 6) On July 7, 2016, Oikos Networks transferred \$1,500,000 from its account ending in *5568 to an account in the name Unindicted Co-conspirator #12 ending in *5307.
- 7) On July 8, 2016, Unindicted Co-conspirator #12 transferred \$1,500,000 from its account ending in *5307 to the Olivet University account ending in *5760 and controlled by Lingyi Xiao (a.k.a. John Xiao).
- 8) On July 8, 2016, the Olivet University account ending in *5760 and controlled by Lingyi Xiao (a.k.a. John Xiao) transferred approximately \$220,000 to an account in the name of Olivet University ending in *7071.
- 9) On July 8, 2016, Olivet University transferred approximately \$170,000 from its account ending in *7071 to an account in the name of IBT Media ending in *4437 and controlled by Etienne Uzac.

- 10) On July 8, 2016, IBT Media transferred approximately \$178,000 from its account ending in *4437 to an account in the name of Newsweek LLC ending in *4320 and controlled by Etienne Uzac.
- 11) On July 8, 2016, Newsweek LLC transferred approximately \$30,479 from its account ending in *4320 to Lender #1.
- 12) On July 8, 2016, Newsweek LLC transferred approximately \$137,249 from its account ending in *4320 to Lender #2.
- 13) On September 15, 2016, William Anderson, on behalf of Olivet University, signed a financing agreement with Lender #6 for high-capacity servers to be installed at Olivet University's campus in Wingdale, NY.
- 14) On Friday September 23, 2016, pursuant to the September 15, 2016 agreement between Olivet University and Lender #6, Oikos Networks accepted \$1,265,140 into an Oikos Networks account ending in *5568.
- 15) On September 27, 2016, Olivet University transferred approximately \$1,000,000, which funds originated from the \$1,265,140 provided to Oikos Networks pursuant to the September 15, 2016 agreement between Olivet University and Lender #6, from its account ending in *2187 and controlled by Lingyi Xiao (a.k.a. John Xiao) to an account in the name of Unindicted Co-conspirator #13 ending in *9860.
- 16) Also on September 27, 2016, Unindicted Co-conspirator #13 transferred approximately \$2,000,000 for a mortgage payment from its account ending in *9860.
- 17) On July 5, 2016, Andrew Lin (a.k.a. Tony Lin), on behalf of Olivet University, signed an agreement with Lender #5 for approximately \$2,348,339 in financing for high-capacity computer servers to be installed at Olivet University's campus in Wingdale, NY.

- 18) On July 15, 2016, pursuant to the July 5, 2016 agreement between Olivet University and Lender #5, Oikos Networks accepted \$2,348,339 from Lender #5 into its account ending in *5568.
- 19) Also on July 15, 2016, Oikos Networks transferred approximately \$1,000,000 from its account ending in *5568 to an Olivet University account ending in *2187 and controlled by Lingyi Xiao (a.k.a. John Xiao).
- 20) Also on July 15, 2016, Oikos Networks transferred approximately \$1,000,000 from its account ending in *5568 to an Olivet University account ending in *2237.
- 21) Also on July 15, 2016, Olivet University transferred approximately \$2,000,000 from its accounts ending in *2237 and *2187, to its account ending in *5760 and controlled by Lingyi Xiao (a.k.a. John Xiao).
- 22) On Monday July 18, 2016, Olivet University transferred approximately \$3,000,000 from its account ending in *5760 and controlled by Lingyi Xiao (a.k.a. John Xiao) to a financial institution.

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants William Anderson, Lingyi Xiao (a.k.a. John Xiao), and Olivet University of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 7, 2015, with the intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #1, and defendants' intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants William Anderson, Etienne Uzac, and IBT Media Inc. (a.k.a. Newsweek Media Group) of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about October 21, 2015, with the intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #1, and defendants' intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant William Anderson, Etienne Uzac and IBT Media Inc. (a.k.a. Newsweek Media Group) of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 9, 2016, with the intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #1, and defendants' intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant William Anderson, Etienne Uzac and IBT Media Inc. (a.k.a. Newsweek Media Group) of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about March 4, 2016, with the intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #2, and defendants' intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants William Anderson, Lingyi Xiao (a.k.a. John Xiao), and Olivet University of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about June 28, 2016, with the intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #7, and defendants' intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant William Anderson, Etienne Uzac and IBT Media Inc. (a.k.a. Newsweek Media Group) of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about August 24, 2016, with the intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #3, and defendants' intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

TENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant William Anderson, Etienne Uzac, and Christian Media Corporation of the crime **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, in violation of Penal Law §175.10, committed as follows:

The defendants, in the County of New York and elsewhere, on or about November 22, 2016, with the intent to defraud, made and caused a false entry in the business records of an enterprise, to wit, Lender #4, and defendants' intent to defraud included an intent to commit another crime and to aid and conceal the commission thereof.

ELEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants William Anderson, Etienne Uzac, Christian Media Corporation, IBT Media Inc. (a.k.a. Newsweek Media Group), and Oikos Networks of the crime of **MONEY LAUNDERING IN THE SECOND DEGREE**, in violation of Penal Law §470.15(1)(b)(ii)(A), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about November 9, 2015 to on or about December 12, 2016, knowing that the property, to wit, money obtained pursuant to one and more equipment financing leases, involved in one and more financial transactions represented the proceeds of a Scheme to Defraud in the First Degree, conducted one and more such financial transactions, which in fact involved the proceeds of Scheme to Defraud in the First Degree, knowing that the transaction and transactions in whole and in part were designed to conceal and disguise the nature, the location, the source, the ownership and the control of the property, and the total value of the property involved in such

financial transaction and transactions exceeded one hundred thousand dollars.

TWELFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants William Anderson, Etienne Uzac, Christian Media Corporation, and IBT Media Inc. (a.k.a. Newsweek Media Group) of the crime of **MONEY LAUNDERING IN THE SECOND DEGREE**, in violation of Penal Law §470.15(1)(b)(i)(A), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about November 9, 2015 to on or about December 12, 2016, knowing that the property, to wit, money obtained pursuant to one and more equipment leases, involved in one and more financial transactions represented the proceeds of a Scheme to Defraud in the First Degree, conducted one and more such financial transactions, which in fact involved the proceeds of Scheme to Defraud in the First Degree, to wit, one and more equipment lease financing payments, with intent to promote the carrying on of specified criminal conduct, to wit, Scheme to Defraud in the First, and the total value of the property involved in such financial transaction and transactions exceeded one hundred thousand dollars.

THIRTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants William Anderson, Lingyi Xiao (a.k.a. John Xiao), Oikos Networks, and Olivet University, of the crime of **MONEY LAUNDERING IN THE SECOND DEGREE**, in violation of Penal Law §470.15(1)(b)(ii)(A), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about August 31, 2015 to on or about September 27, 2016, knowing that the property, to wit, money obtained pursuant to one and more equipment financing leases, involved in one and more financial transactions represented the proceeds of a Scheme to Defraud in the First Degree, conducted one and more such financial transactions, which in fact involved the proceeds of Scheme to Defraud in the First Degree, knowing that the transaction and transactions in whole and in part were designed to conceal and disguise the nature, the location, the source, the ownership and the control of the property, and the total value of the property involved in such financial transaction and transactions exceeded one hundred thousand dollars.

FOURTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants William Anderson, Lingyi Xiao (a.k.a. John Xiao), Oikos Networks, and Olivet University, of the crime of **MONEY LAUNDERING IN THE SECOND DEGREE**, in violation of Penal Law §470.15(1)(b)(i)(A), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about August 31, 2015 to on or about September 27, 2016, knowing that the property, to wit, money obtained pursuant to one and more equipment leases, involved in one and more financial transactions represented the proceeds of a Scheme to Defraud in the First Degree, conducted one and more such financial transactions, which in fact involved the proceeds of Scheme to Defraud in the First Degree, to wit, one and more equipment lease financing payments, with intent to promote the carrying on of specified criminal conduct, to wit, Scheme to Defraud in the First, and the total value of the property involved in such financial transaction and transactions exceeded one hundred thousand dollars.

FIFTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants William Anderson and Christian Media Corporation of the crime of **CRIMINAL CONTEMPT IN THE SECOND DEGREE**, in violation of Penal Law §215.50(3), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about December 13, 2017 to on or about October 5, 2018, knowing that the Court issued a lawful process and mandate, namely, a Grand Jury Subpoena dated December 13, 2017, engaged in intentional disobedience and resistance by failing to produce certain documents in their possession that were responsive to the Grand Jury Subpoena dated December 13, 2017.

SIXTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant Olivet University of the crime of **CRIMINAL CONTEMPT IN THE SECOND DEGREE**, in violation of Penal Law §215.50(3), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about July 27, 2017 to on or about July 27, 2018, knowing that the Court issued a lawful process and mandate, namely, a Grand Jury Subpoena dated July 27, 2017, engaged in intentional disobedience and resistance by failing to produce certain documents in their possession that were responsive to the Grand Jury Subpoena dated July 27, 2017.

CYRUS R. VANCE, JR.

District Attorney

GJ #- 9- 1B

9th GRAND JURY

OCT 31 2018

Filed:

NA

No. 03573-2018

THE PEOPLE OF THE STATE OF NEW YORK

-against-

WILLIAM ANDERSON, ANDREW LIN (a.k.a. TONY LIN), ETIENNE
UZAC, LINGYI XIAO (a.k.a. JOHN XIAO), CHRISTIAN MEDIA
CORPORATION, IBT MEDIA INC. (a.k.a. NEWSWEEK MEDIA GROUP),
OIKOS NETWORKS, and OLIVET UNIVERSITY

Defendants.

INDICTMENT

(Counts 1, 2, 5, 6, 7, 9, 10, 11, 12, and 15 herein superseding
Indictment No. 3495/18 in its entirety)

SCHEME TO DEFRAUD IN THE FIRST DEGREE, P.L. §190.65(1)(b) - DEF. W. Anderson, A. Lin (a.k.a. Tony Lin), E. Uzac, L. Xiao (a.k.a. John Xiao), Christian Media Corporation, IBT Media Inc. (a.k.a. Newsweek Media Group), Oikos Networks, Olivet University, 1 Ct, all defendants
CONSPIRACY IN THE FOURTH DEGREE, in violation of Penal Law §105.10(1) - DEF. W. Anderson (2 Cts), E. Uzac (1 Ct), L. Xiao (a.k.a. John Xiao) (1 Ct), Christian Media Corporation (1 Ct), IBT Media Inc. (a.k.a. Newsweek Media Group) (1 Ct), Oikos Networks (2 Cts), Olivet University (1 Ct)
FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, P.L. §175.10 - DEF. W. Anderson (7 Cts), E. Uzac (5 Cts), L. Xiao (a.k.a. John Xiao) (2 Cts), Christian Media Corporation (1 Ct), IBT Media Inc. (a.k.a. Newsweek Media Group) (4 Cts), Olivet University (2 Cts)
MONEY LAUNDERING IN THE SECOND DEGREE, P.L. §470.15(1)(b)(ii)(A) - DEF. W. Anderson (2 Cts), E. Uzac (1 Ct), L. Xiao (a.k.a. John Xiao) (1 Ct), Christian Media Corporation (1 Ct), IBT Media Inc. (a.k.a. Newsweek Media Group) (1 Ct), Oikos Networks (2 Cts), Olivet University (1 Ct)
MONEY LAUNDERING IN THE SECOND DEGREE, P.L. §470.15(1)(b)(i)(A) - DEF. W. Anderson (2 Cts), E. Uzac (1 Ct), L. Xiao (a.k.a. John Xiao) (1 Ct), Christian Media Corporation (1 Ct), IBT Media Inc. (a.k.a. Newsweek Media Group) (1 Ct), Oikos Networks (1 Ct), Olivet University (1 Ct)
CRIMINAL CONTEMPT IN THE SECOND DEGREE, §215.50(3) - DEF. W. Anderson (1 Ct), Christian Media Corporation (1 Ct), Olivet University (1 Ct).

CYRUS R. VANCE, JR., District Attorney

A True Bill

Sean Phippen & Solomon Shinerock
Major Economic Crimes Bureau

Foreman, 

ADJOURNED TO PART ____ ON ____